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15 Attorneys for Defendants
16 UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,
21 Plaintiff,
22
23 v.
24 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,
25 Defendant.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
CORY BULAND IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO, LLC'S OPPOSITION
TO WAYMO'S REQUEST TO FILE A
MOTION REGARDING
SPOILIATION**

Courtroom: 8, 19th Floor
Judge: The Honorable William Alsup
Trial Date: December 4, 2017

1 I, Cory Buland, declare as follows:

2 1. I am an associate with the law firm of Susman Godfrey LLP. I am a member in
3 good standing of the Bar of the State of New York. I make this declaration based on personal
4 knowledge and, if called as a witness, I could and would testify competently to the matters set
5 forth herein. I make this declaration in support of Defendants Uber Technologies, Inc. and
6 Ottomotto LLC's Opposition to Waymo's Request to File A Motion Regarding Spoliation.

7 2. Attached as **Exhibit 1** is a true and correct copy of the August 10, 2017
8 Declaration of Allan T. Vogel in Support of Mr. Kalanick's Opposition to Waymo's Motion to
9 Compel Mr. Kalanick's Cell Phone/Cell Phone Image.

10 3. Attached as **Exhibit 2** is a true and correct copy of the August 10, 2017
11 Declaration of Robert L. Uriarte in Support of Mr. Kalanick's Opposition to Waymo's Motion to
12 Compel Mr. Kalanick's Cell Phone/Cell Phone Image.

13 4. Attached as **Exhibit 3** is a true and correct copy of excerpts from the transcript of
14 the July 28, 2017 deposition of Kristinn Gudjonsson.

15 5. Attached as **Exhibit 4** is a true and correct copy of excerpts from Waymo's
16 September 1, 2017 Privilege Log.

17 6. Attached as **Exhibit 5** is a true and correct copy of excerpts from the September 7,
18 2017 Expert Report of Erik Laykin.

19 7. Attached as **Exhibit 6** is a true and correct copy of the October 17, 2017
20 Declaration of Arturo J. Gonzalez in Support of Defendants' Uber Technologies, Inc. and
21 Ottomotto LLC's Opposition to Waymo's Motion to Compel Stroz-Related Discovery.

22 8. Attached as **Exhibit 7** is a true and correct copy of the October 17, 2017
23 Declaration of Sylvia Rivera in Support of Defendants' Uber Technologies, Inc. and Ottomotto
24 LLC's Opposition to Waymo's Motion to Compel Stroz-Related Discovery.

25 9. Attached as **Exhibit 8** is a true and correct copy of the October 17, 2017
26 Declaration of Rachel M. Walsh in Support of Otto Trucking LLC's Opposition to Waymo's
27 Motion to Compel Stroz-Related Discovery.

10. Attached as **Exhibit 9** is a true and correct copy of excerpts from the transcript of the June 22, 2017 deposition of Ningjun Qi.

11. Attached as **Exhibit 10** is a true and correct copy of excerpts from the transcript of the June 19, 2017 deposition of Cameron Poetzscher.

12. Attached as **Exhibit 11** is a true and correct copy of excerpts from the transcript of the July 27, 2017 deposition of Travis Kalanick.

13. Attached as **Exhibit 12** is a true and correct copy of an October 24, 2017 email from Jeff Nardinelli regarding the first date that Waymo instituted a litigation hold.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 25th day of October, 2017, at New York, New York.

/s/ *Cory Buland*

Cory Buland

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Motion. In compliance with General Order 45, X.B., I hereby attest that Cory Buland has concurred in this filing.

Dated: October 25, 2017

/s/ Arturo J. Gonzalez

ARTURO J. GONZALEZ